```
Date: Wed, 15 Jun 2022 18:16:46 +0000
         From: FedRAMP <info@fedramp gov>
Reply-To: FedRAMP <info@fedramp gov>
               To: William Hamilton - XAAB <william hamilton@gsa.gov>
      Message-ID: <E2YW7WOY6KD 62aa220e40645 333fc68e8cb95c84684 sprut@zendesk.com>
         Subject: [Request received] Action Needed MBL Technologies Formal Complaint Notice
  X-Source-Folder: GSA-2022-001178--william hamilton@gsa.gov 0
X-Email-Hash-MD5: 2779c73360aef62bea1e63fc925755d1
```

##- Please type your reply above this line -##

Your request (65036) has been received and is being reviewed by the FedRAMP support staff.

To add additional comments, reply to this email.



William Hamilton – XAAB (FedRAMP)

Jun 15, 2022, 1:16 PM GMT-5



After reviewing MBL Technologies' security assessment report (SAR) for Issio Information System, the FedRAMP PMO identified several fundamental testing accuracy and completeness issues associated with the assessment. Additionally, it was confirmed by A2LA that the assessors utilized for this assessment do not meet the personnel requirements specified in the A2LA R311 - Specific Requirements: Federal Risk and Authorization Management Program (FedRAMP). Please see the enclosed letter for more information related to these concerns.

Based on the severity of the issues noted above and, in accordance with FedRAMP's 3PAO Obligations and Performance Standards, your FedRAMP recognition status is now "In-Remediation" and will be noted as such on your FedRAMP Marketplace page. Please consider this a formal complaint that needs to be addressed with your quality system. Within 10 business days of this notification, a written formal corrective action plan (CAP) response must be provided both the FedRAMP PMO and A2LA (via info@fedramp.gov and fedramp@a2la.org) that identifies the root cause, how and when the deficiencies will be remediated, and actions that will be taken to correct these issues. At a minimum, all corrective actions must occur and be approved by the FedRAMP PMO prior to the submission of any new assessment deliverables to the FedRAMP PMO.

If MBL Technologies fails to complete the formal CAP, your organization's FedRAMP recognition status will be removed from the FedRAMP Marketplace. In some cases resolution may require a re-assessment by A2LA for validation of the successful completion of the CAP, as determined by FedRAMP.

Please don't hesitate to reach out if you have any further questions.

Thank You -John Hamilton FedRAMP Program Manager of Security Operat ons Technology Transformat on Service | GSA | william.hamilton@gsa.gov

Attachment(s)

MBL Technologies Formal Complaint Letter - Issio Assessment Concerns 061522.pdf

You are an agent. Add a comment by replying to this email or view ticket in Zendesk Support.

Ticket # 65036 Status New Requester William Hamilton - XAAB CCs (b) (6), Brian Conrad - QXC, Bibi Abdullah, FedRAMP, (b) (6) Group Assignee Priority Type Ticket Channel By Mail

This email is a service from FedRAMP. Delivered by Zendesk

Good afternoon

This has been received. Before we respond, I would like to confirm that this is referencing the SAR that was sent to the PMO November 12, 2020? If so, this was performed well before the A2LA Personnel requirements change which were announced in the updated R311 dated October 12, 2021.

We would like to set up a call to discuss this. We are concerned we are being penalized because the PMO is upholding current standards to an assessment that was performed in 2020. Please advise us of your schedule.

Regards,

From: John Hamilton <william.hamilton@gsa.gov>

Sent: Wednesday, June 15, 2022 2:16 PM

To:(b) (6) mbltechnologies com>; FedRAMP < FedRAMP@mbltechnologies.com>

Cc: Brian Conrad - QQC < brian conrad@gsa.gov>; (b) (6) a 2la org>; Bibi Abdullah < babdullah@a2la org>; info fedramp < info@fedramp.gov> Subject: [External] Action Needed: MBL Technologies Formal Complaint Notice

(b) (6)

After reviewing MBL Technologies' security assessment report (SAR) for Issio Information System, the FedRAMP PMO iden ified several fundamental testing accuracy and completeness issues associated with the assessment. Additionally, it was confirmed by A2LA that the assessors utilized for his assessment do not meet the personnel requirements specified in the <u>A2LA R311 - Specific Requirements: Federal Risk and Au horization Management Program (FedRAMP)</u>. Please see the enclosed letter for more informa ion related to these concerns.

Based on the severity of the issues noted above and, in accordance with FedRAMP's 3PAO Obligations and Performance Standards, your FedRAMP recognition status is now "In-Remediation" and will be noted as such on your FedRAMP Marketplace page. Please consider this a formal complaint that needs to be addressed with your quality system. Within 10 business days of this notification, a written formal corrective action plan (CAP) response must be provided both the FedRAMP PMO and A2LA (via info@fedramp.gov and fedramp@a2la.org) that identifies the root cause, how and when the deficiencies will be remediated, and actions hat will be taken to correct these issues. At a minimum, all corrective actions must occur and be approved by the FedRAMP PMO prior to the submission of any new assessment deliverables to the FedRAMP PMO.

If MBL Technologies fails to complete the formal CAP, your organization's FedRAMP recognition status will be removed from the FedRAMP Marketplace. In some cases resolution may require a re-assessment by A2LA for validation of the successful completion of the CAP, as determined by FedRAMP.

Please don't hesitate to reach out if you have any further questions.

Thank You -

John Hamilton

FedRAMP Program Manager of Security Operations

Technology Transformation Service | GSA

(b) (6)

william.hamilton@gsa.gov

Excellent - thanks for taking care of that!

On Tue, Jun 7, 2022 at 11:03 AM(b) (6) - QQC-C <(b) (6) @gsa gov> wrote:

Hi John - FYI, I had these emails (excluding Lazarus and Digital Forge) added to the list for the upcoming townhall

(b) (6)

On Tue, Jun 7, 2022 at 10:46 AM John Hamilton wrote: Hi[6] - Many thanks for providing this list!

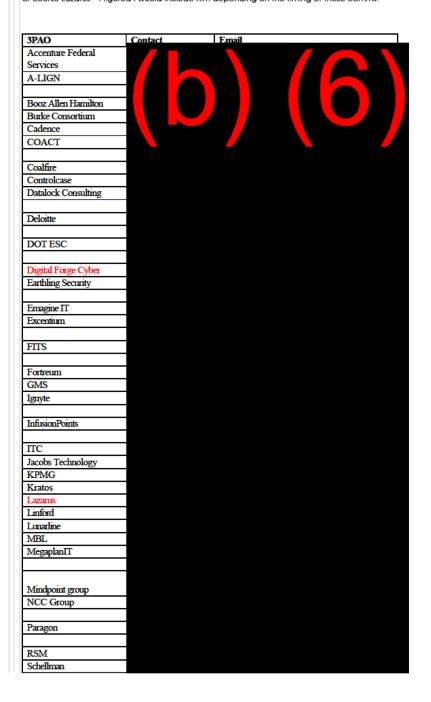
Yes, if you could please reach out to Digital Forge again that would be great; it could be they have yet to send us all of the requested information to have their Marketplace page created

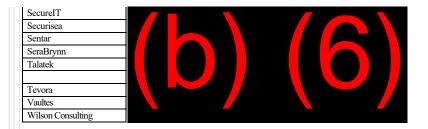
Best -John

On Fri, Jun 3, 2022 at 9:54 AM(b) (6) 42la org wrote:

Hev al

Please see the table below for the contact information for all current 3PAOs. The text is red for two exceptions – Digital Forge Cyber and Lazarus. Digital Forge was approved back in March but I did not see their listing on the Marketplace. Please let me know if we should reach out to them to follow up. And of course Lazarus – I figured I would include him depending on the timing of these comms.





Please let me know if you need anything else.

Thanks!

A2LA | Cybersecurity Program Manager

Direct: 301 644 3215 | (b) (6) A2LA.org

My Hours: 8:00 am - 4 00 pm (ET)

A2LA Office Hours: 8:00 am - 8:00 pm (ET)

5202 Presidents Court, Suite 220 Frederick, MD 21703 Main Line: 301 644 3248

www A2LA org







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John Hamilton
FedRAMP Program Manager of Security Operations
Technology Transformation Service | GSA
| william hamilton@gsa.gov



U.S. General Services Administration

Evan IsaacsTechnology Transformation Services
Program Management Office, FedRAMP

John Hamilton FedRAMP Program Manager of Security Operations
Technology Transformation Service | GSA

| william.hamilton@gsa.gov

```
Date: Tue, 7 Jun 2022 10:43:55 -0400
      Message-ID: <CADR9bRqgg0728bM0XtAxXA2WTozpQ_5J9b2LFqqnorJ9ut3Gkg@mail.gmail.com>
          Subject: Re 3PAO Contact List
           From: John Hamilton <william.hamilton@gsa gov>
Ta(b)(6) - QQC-C <(b)(6) @
                                                    @gsa gov>
  X-Source-Folder: GSA-2022-001178-william hamilton@gsa.gov_0
X-Email-Hash-MD5: f92e4fec29d33f51a5000202374b8628
```

Thanks 1) [6] - I think this is a good list that we can use; but please remove the contact from Lazarus Alliance highlighted in red

John

On Tue, Jun 7, 2022 at 9:26 AM(b) (6) - QQC-C (b) (6) @gsa gov wrote: See below - Evan got this from A2LA! Several of these look like general fedramp@ email boxes, so not sure if we have more of a leadership contact -- Forwarded message -----From: (b) (6) - QQC-C <(b) (6) @gsa gov>
Date: Fri, Jun 3, 2022 at 10:02 AM Subject: Fwd: 3PAO Contact List - QQC-C < (b) (6)

@gsa gov>, (b) (6) - QQC-C (b) (6) @gsa gov>

Hi(b) (6)

Cc:

I believe (b) (6) 's been working with you on the next 3PAO listening session. Is it possible to ensure these names are on the invite list? This is a list we got from A2LA with their main POCs for each 3PAO I'd expect them all to be on whatever list we use, but this will be a good check

You can ignore the ones in red for the time being - I'll follow up if they need an invitation once I can confirm

Let me know if you want to discuss anything

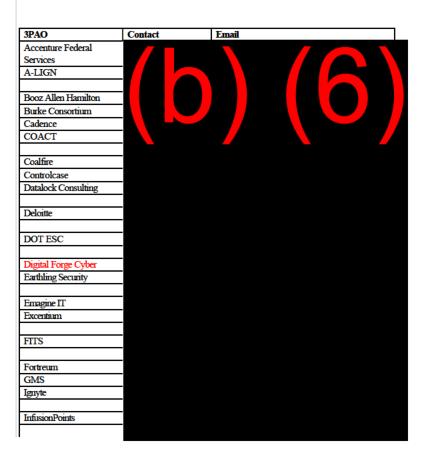
--- Forwarded message ----From: (b) (6) 4(b) (6) <u>a2la org</u>>

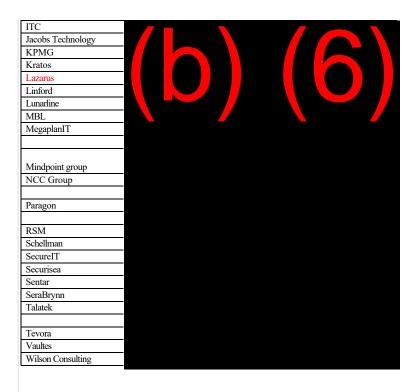
Date: Fri, Jun 3, 2022 at 9:54 AM Subject: 3PAO Contact List

To: William Hamilton - XAAB < john hamilton@gsa gov>, laurie southerton@gsa gov> (laurie southerton@gsa gov>, b) (6) - TAC-C < (b) (6) - @gsa gov>

Hey all

Please see the table below for the contact information for all current 3PAOs. The text is red for two exceptions - Digital Forge Cyber and Lazarus. Digital Forge was approved back in March but I did not see their listing on the Marketplace. Please let me know if we should reach out to them to follow up. And of course Lazarus – I figured I would include him depending on the timing of these comms.





Please let me know if you need anything else.

Thanks!

A2LA | Cybersecurity Program Manager

Direct: 301 644 3215 | (b) (6) A2LA.org

My Hours: 8:00 am - 4 00 pm (ET)

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U.S. General Services Administration

Evan Isaacs Technology Transformation Services Program Management Office, FedRAMP



Bailey Feldman

Contractor, FedRAMP PMO Support

FedRAMP | TTS | GSA



m (b) (6)
e: bailey.feldman@gsa gov

John Hamilton
FedRAMP Program Manager of Security Operations
Technology Transformation Service | GSA

| william.hamilton@gsa.gov

From: Brian Conrad - QQC <bri>Date: Tue, 14 Jun 2022 16:23:13 -0400

 $\label{local_model} \\ \text{Message-ID: } <\text{CAKrqu1Z=q_pv4THof4GhWuEDFGZ8qPAG8nUVzAmz16QgHwzrrw@mail.gmail.com} \\ \\$

Subject: Re Document shared with you "DRAFT MBL Technologies Formal CAP Notice 061422"

To: William Hamilton - QQC <william.hamilton@gsa gov>

X-Source-Folder: GSA-2022-001178-william hamilton@gsa.gov_0

X-Email-Hash-MD5: 909d67b2a2bee70f3774d603570d4c65

Thank you John - I am good with this

R/ Brian



Brian H. Conrad

FedRAMP Director (Acting)/Cybersecurity Program Manager

FedRAMP | TTS | GSA

m· (b) (6)

e: brian conrad@gsa gov

e (b) (6) pentagon.smil.mil

On Tue, Jun 14, 2022 at 3:11 PM William Hamilton - QQC (via Google Docs) < drive-shares-dm-noreply@google com > wrote:

william.hamilton@gsa.gov shared a document



william.hamilton@gsa.gov has invited you to edit the following document:

Hi Brian - Here is a final draft of the MBL Technologies formal CAP notice regarding their poor assessment for Issio. As discussed earlier, MBL used unqualified personnel and provided incomplete / inaccurate assessment deliverables. If you need any other info, just let me know.

Thanks -

John

■ DRAFT_MBL Technologies Formal CAP Notice_061422

Open

Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA

You have received this email because william.hamilton@gsa.gov shared a document with you from Google Workspace Docs.

```
From: (b) (6) - QQC-C (b) (0
Date: Fri, 10 Jun 2022 10:34:14 -0400
          Message-ID: <CAHEOc4ANPVFP32z1wywhbdV_m0ipiKx-KPZA8xq9YwuMLyMjbA@mail.gmail.com>
                 Subject: Re Issio Gap Review Meeting
                                                        @issio.net>
                          To(b)
                                                             @issio.net>, Cynthia Bergevin - QQC-C <cynthia.bergevin@gsa.gov>, "DeLeo, Martin" <Martin DeLeo@va gov>, (b)
                                                 mbltechnologies com>, Jennifer Carlson - QQC-C <cynthia.bergevin@gsa.gov>, "DeLeo, Martii mbltechnologies com>, Jennifer Carlson - QQC-C <jennifer.carlson@gsa.gov>, (b) (6) Jackson, Charles L." <Charles.Solomon-Jackson@va gov>, VA FedRAMP PMO <valedramppmo@gsa.gov>, William Hamilton - QQC <john hamilton@gsa.gov>, (b) (6) - QQC-C < (s) (6) - QQC-C < (s
                         Cc:
                                                                                                                                                                                                                                         - QQC-C
                                                                                                                                                                                                      @va gov>,
     X-Source-Folder: GSA-2022-001178--william hamilton@gsa.gov 0
X-Email-Hash-MD5: 2cf7fb7b2b384120d9c1580f67924841
Thank you for the notice The review of the attestation letter will be underway shortly
Yours Truly,
(b) (6)
FedRAMP PMO Support
FedRAMP | TTS | GSA
                     @qsa.gov
On Fri, Jun 10, 2022 at 6:15 AM (b) (6) @issio net> wrote:
 Hello
  I am happy say that the updated Attestation Letter has been uploaded to MAX by Eric
  We look forward to seeing your final report, and of course, let us know if there is anything else we can help with in the meantime
  Best.
 (b) (6)
  On Wed, Jun 8, 2022 at 14:07 (b) (6) - QQC-C < (b) (6) @gsa gov > wrote:
    Thank you for your participation this week in the Gap Review Mtg. Coming out of that conversation, we have mostly post-Authorization actions; these will be written up in the
    final Report with required closure time frames (30 days receiving congrats email, etc.). However, there is one pre-Authorization action.
         1. 3PAO: Update the Attestation Letter with discussion and validation of PIV/CAC configuration being in place so that agency customers can use their PIV/CAC cards if
              desired.
    Post- Authorization Actions (3PAO actions to be performed during annual assessment):
         1. AC-2: 3PAO: Since Agency confirmed that they started using system post-initial assessment, validate Agency user accounts are in the boundary and are
              appropriately reflected in the SSP.
                    a. CSP: Update language regarding the first "hop" into the system and clarify usage of Google Authenticator and Thales hard token. Explicitly state which tool is
                         used as the Authenticator and which is for the Verifier.

    b. 3PAO: Validate CSP's implementation and use of authenticator(s) and verifier

         3. SC-7: 3PAO: Validate that the management and ops environments are on separate subnets, and both were assessed
         4. SC-13: 3PAO: Validate the FIPS Validation certificates on crypto module used for MFA verifier
    Thank you, and we look forward to the updated Attestation Letter
    Yours Truly,
    (b) (6)
FedRAMP PMO Support (Noblis)
FedRAMP | TTS | GSA
    On Thu, May 26, 2022 at 5:08 PM(b) (6)
                                                                                     - QQC-C <(b) (6)
                                                                                                                                    @gsa gov> wrote:
      Awesome, thank you (6) (6) I'll have the invite out shortly
       Yours Truly,
      (b) (6)
       FedRAMP | TTS | GSA
       On Thu, May 26, 2022 at 4 04 PM(b) (6) @issio net> wrote:
        Hello
        Thank you for the update! We are glad to hear that things are moving along and hope that we can resolve these outstanding concerns and questions quickly
        The best time slot for us would be Monday June 6th at 12:00 pm ET
        We look forward to meeting with you again soon
        Best,
        On Thu, May 26, 2022 at 14:26 (b) (6) - QQC-C (b) (6) @gsa gov wrote:
          Good afternoon,
```

We're through most of the Gap Review of the Issio package and have some questions to clarify. There may be updates required prior to authorization, but the goal will be to resolve concerns in discussion and write up their resolu ion in the report with post-authorization actions.

Unfortunately, we're completely booked up for next week already. Please let me know which of the following times, for one hour, work best for you:

- Monday June 6th at 11am, 12pm, or 1pm ET
- Tuesday June 7th at 10am or 3pm ET

In context, we are nearly through the initial Authorization process:

- Full Package Submission
- Initial Review Phase
- Conduct Review Mtg
- · Remediation Phase
- Gap Review Phase: PMO usually takes ~10 days to complete and reach out for a Gap Review Mtg or send the Congratula ions Email ← Issio is currently at this point. We're almost done he Gap Review, and need to answer some questions and address some continuing concerns. If those are answered and addressed in this round of remediation, we will move forward. If not, we will repeat this phase.
- The Congratulations email will come from PMO Leadership and contain 2 forms, a survey, and a request to check Marketplace service description
- When those are returned, the Marketplace designation will be changed to FedRAMP Authorized!

Thank you, and we look forward to talking with you again soon.

Yours Truly,

